

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**JILL SHERWOOD,**

**Plaintiff,**

**v.**

**PORTFOLIO RECOVERY  
ASSOCIATES, LLC,**

**Defendant.**

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**CASE NO. 2:20-cv-1820**

**NOTICE OF REMOVAL**

**PLEASE TAKE NOTICE** that on this date, Defendant Portfolio Recovery Associates, LLC hereby removes the above-captioned matter to this Court from the Court of Common Pleas of Allegheny County, Pennsylvania and in support thereof avers as follows:

1. PRA is the Defendant in a civil action originally filed on February 19, 2020, in the Court of Common Pleas of Allegheny County, Pennsylvania titled *Jill Sherwood v. Portfolio Recovery Associates, LLC* and docketed to Case No. AR-20-03888.

2. This removal is timely under 28 U.S.C. § 1446(b). PRA received service of process on October 26, 2020.

3. Pursuant to 28 U.S.C. § 1446(b), attached hereto as Exhibit A are copies of all process, pleadings and orders PRA received in the state court action.

4. The United States District Court for the Western District of Pennsylvania has original jurisdiction over this action pursuant to 28 U.S.C. § 1331, in that Plaintiff filed claims against PRA alleging violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.*

5. On this date, PRA has provided notice of this Removal to all counsel and to the Court of Common Pleas of Allegheny County, Pennsylvania.

WHEREFORE, Defendant Portfolio Recovery Associates, LLC respectfully removes this case to the United States District Court for the Western District of Pennsylvania.

Respectfully submitted,

**MESSER STRICKLER, LTD.**

By: /s/ Lauren M. Burnette  
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*Counsel for Defendant*

Dated: November 24, 2020

**CERTIFICATE OF SERVICE**

I certify that on November 24, 2020, a true copy of the foregoing document was served as follows:

*Via Email and U.S. Mail, Postage Prepaid*

Emily S. Gomez-Hayes, Esq.  
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*Counsel for Plaintiff*

*Via Electronic Filing*

Court of Common Pleas  
Allegheny County  
414 Grant St.  
Pittsburg, PA 15219

**MESSER STRICKLER, LTD.**

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*Counsel for Defendant*

Dated: November 24, 2020